REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the subject application. The Office Action of November 5, 2003 has been received and its contents carefully reviewed.

In the Office Action, the Examiner rejected claims 1-6 under 35 U.S.C. § 103(a) as being unpatentable over Francis et al. (U.S. Patent No. 5,709,450). The rejection of these claims is traversed and reconsideration of the claims is respectfully requested in view of the following remarks.

The rejection of claims 1-6 under 35 U.S.C. § 103(a) as being unpatentable over Francis et al. is traversed and reconsideration is respectfully requested.

Independent claim 1 is allowable over Francis et al. in that claim 1 recites a combination of elements including, for example, "a connector for electrically connecting the electrode of the lamp to the wire, directly contacting the electrode of the lamp and a portion of the wire." None of the cited references including Francis et al., singly or in combination, teaches or suggest at least this feature of the claimed invention. Accordingly, Applicant respectfully submits that claims 2-6, which depend from claim 1, are also allowable over the cited references.

The Examiner cites Francis et al. as disclosing "Mounting the DLA 14 in the central opening 12... is a base [having] a first ...conductor 22... [connecting] end 24 of the DLA [14]. An opposite end of the first conductor 22 is connected to a ...pin 26. ...[a] socket 50 [rotatably mounted on the base 16] ...[having] a first concentric conductor 52 having a collar

54 at one and a blade terminal 56 at an opposite end. The collar 54... is provided for electrically mating with the pin 26 of the ...first conductor 22... The socket [50] also has two tubular openings 70 and 72 which allow for entry of lead wires 74 and 76... The lead wires have appropriately crimped to them terminals 78 which have a nib 80. The nibs 80 fit within matching apertures 82 provided in the blade terminals 56 and 61, respectively." (Office Action at 2). Moreover, the Examiner states that Francis discloses the present invention except for the shape of the connector. Applicant agrees with the Examiner that Francis et al. lacks the shape of the connector. Additionally, Applicant respectfully submits, as noted above, that Francis et al. lacks at least "a connector for electrically connecting the electrode of the lamp to the wire, the connector directly contacting the electrode of the lamp and a portion of the wire."

In the "Response to Arguments" section of the outstanding Office Action, and in response to the Applicant's arguments presented in the Reply Under 37 CFR § 1.111 filed on September 22, 2003 and essentially duplicated above, the Examiner asserts "it has been held that a recitation with respect to the manner in which a claimed apparatus is intended to be employed does not differentiate the claimed apparatus from a... apparatus [in a reference] satisfying the claimed structural limitations."

Applicant respectfully submits, however, that while the aforementioned citation to *Ex parte Masham* may provide adequate guidance in interpreting the functional portion of apparatus claims, such guidance is inapplicable in the present case. For example, claim 1 requires, among other elements, "a connector... directly contacting the electrode of the lamp

and a portion of the wire." Applicant respectfully submits that such a claim recitation is not merely functional but establishes a readily identifiable structure, namely a connector that directly contacts the electrode of the lamp and a portion of a wire that delivers external voltage. Moreover, Applicant respectfully submits that an exemplary illustration of the structure defined by the claims can be found, for example, at Figure 4 and the related textual passages within the specification as originally filed.

Further, in the "Response to Arguments" section of the outstanding Office Action, the Examiner asserts that "[Francis et al.] does show a connector or second conductor directly connected to the electrode assembly of the lamp and a portion of the wire where the nip fit within matching aperture."

Applicant appreciates the Examiner's further clarification of the alleged teachings of Francis et al. As previously stated by the Examiner, "...lead wires 74 and 76 ...have appropriately crimped to them terminals 78 which have a nib 80. The nibs 80 fit within matching apertures 82 provided in the blade terminals 56 and 61, respectively." Based on the Examiner's statement replicated above, that Francis et al. allegedly shows "a connector or second conductor directly connected to the electrode assembly of the lamp and a portion of the wire where the nip fit within matching aperture," and as can be best understood by Applicant, it appears as though the Examiner is asserting that the "blade terminals 56 and 61" of Francis et al. corresponds to the "connector" as presently claimed. However, Applicant respectfully submits that the connector as presently claimed directly contacts the electrode of the lamp and a portion of the wire. Assuming *arguendo* that the blade terminals 56 and 61

directly connect an electrode assembly of the lamp and a portion of the wire, Applicant respectfully submits the blade terminals 56 and 61 of Francis et al. fail to directly contact the actual electrode of the lamp, as required by the presently claimed invention. Moreover, Applicant respectfully submits Francis et al. fails to teach any structure which may reasonably be interpreted as being a connector that directly contacts the electrode of a lamp and a portion of a wire, as required by the presently claimed invention.

Applicant believes the present application in condition for immediate allowance and early, favorable action is respectfully solicited. If the Examiner deems that a telephone conversation would further the prosecution of this application, the Examiner is invited to call the undersigned at (202) 496-7500.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Respectfully submitted,

Date: February 5, 2004

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